

# EXHIBIT A

**Subject:** Plaintiff's Answers to Defendant's First Interrogatories

**From:** Clif Bennette (cbennette1@verizon.net)

**To:** kberg@gouldberglaw.com;

**Date:** Monday, September 17, 2018 5:44 PM

Please see attached.

Regards,

Clif

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## Attachments

- Interrogatories (TO KIM Diane's answers 5\_25 pm).docx (17.91KB)

1. Identify each individual who supervised Plaintiff and/or to whom Plaintiff reported for the period of her employment by Pamrob, Inc.

Pam Hochstin and Robin Mizrahi

2. Identify all individuals with knowledge or information as to Plaintiffs alleged agreed upon rate of pay for the years 2011 to 2016.

Pam Hochstin, Robin Mizrahi Laurie Barrone, Michael Tannenholtz, Lee Klinger, Nicole Stabile

3. Identify all individuals with knowledge or information as to Plaintiffs job duties, responsibilities, daily tasks, routine functions, and all work performed for the period 2011 to 2016.

Pam Hochstin  
Robin Mizrahi  
Beatrice Caraballo  
Nicole Stabile  
Laura Huddleston  
Devin Morris  
Laura Walker  
Rayan Persaud  
Lyat Mizrahi  
Nataly Goldstein  
Stacey Hochstin  
Meagan Valenga  
Anita Vargas  
Laurie Barone

4. Identify all individuals with knowledge or information as to Plaintiffs hours of work for the period 2011-2016.

Pam Hochstin  
Robin Mizrahi  
Beatrice Caraballo  
Nicole Stabile  
Laura Huddleston  
Devin Morris  
Laura Walker  
Rayan Persaud  
Lyat Mizrahi  
Nataly Goldstein  
Stacey Hochstin  
Meagan Valenga  
Anita Vargas  
Laurie Barone

5. Identify each individual who determined the hours and/or set the schedule for Plaintiffs hours of work for the period 2011-2016

Pam Hochstin and Robin Mizrahi

6. Identify each individual who determined and/or set the schedule for employees' hours of work, other than Plaintiff, during the period 2011-2016.

Pam Hochstin and Robin Mizrahi

7. Identify the individual(s) with whom Plaintiff entered into an oral employment contract in or about 2010 as alleged in paragraph 15 of the Complaint.

Robin Mizrahi who then spoke to Pam Hochstin and had Plaintiff meet with her

8. Identify the individual(s) who agreed with Plaintiff as to the basis of Plaintiff's pay as alleged in paragraph 17 of the Complaint.

Pam Hochstin and Robin Mizrahi

9. Identify the customer referred to in paragraph 24 of the Complaint.

Susan Goodman, Lisa Ballou, Allison Meltz, Amanda Karp.  
About half the customers Diane didn't know and/or remember their names

10. Identify the similarly situated employees referred to in paragraph 26 of the Complaint.

Lyat Mizrahi; Devin Morris, Beatrice Caraballo, Nicole Stabile, Laura Huddleston, Rayan Persaud

11. Identify each individual with whom Plaintiff and/or Plaintiff's counsel has spoken in reference to the instant lawsuit and/or any of the allegations in the lawsuit from January 1, 2017 to present.

Clif Bennette  
Beatrice Caraballo  
Nicole Stabile  
Devin Morris  
Stacey Hochstin  
Meagan Valenga

12. Identify the individual or entity to whom Plaintiff made inquiry as referenced in paragraph 33 of the Complaint.

Robin, Pam, Devin Morris, Nicole Stabile, Beatrice Caraballo, Stacey Hochstin, Laura Huddleston (liar), Lyat Mizrahi, Nataly Goldstein, Rayan Persaud (liar), Laura Walker

13. Identify all witnesses to the conversation(s) with Pamela Hochstin alleged in paragraph 34 of the Complaint.

Laura Huddleston

14. Identify each individual with whom Plaintiff spoke about clarification of wages and amount of deductions.

Pam Hochstin, Laura Huddleston, Lee Klinger, Nat Wasserstein, Sandra (Lee's assistant), Laurie Barone, Robin Mizrahi.

15. Identify all witnesses to the conversation(s) with Pamela Hochstin alleged in paragraph 35 of the Complaint.

Laura Huddleston

16. Identify all witnesses to the conversation(s) with Pamela Hochstin alleged in paragraph 36 of the Complaint.

Laura Huddleston

17. Identify the three employees referred to in paragraph 36 of the Complaint.

Lyat Mizrahi, Natalie Goldstein, Rayan Persaud.

18. Identify the company's bookkeeper referred to in paragraph 39 of the Complaint.

Laurie Barone

19. Identify each individual with whom Plaintiff spoke or to whom Plaintiff inquired regarding the accuracy and legality of deductions as referenced in paragraph 84 of the Complaint.

Pamela Hochstin, Lee Klinger, Laura Huddleston, Debbie Blumenthal

20. Identify each individual who admitted that errors had been made with employee deductions as alleged in paragraph 85 of the Complaint.

Laura Huddleston, Debbie Blumenthal, Staci Hochstin, Laurie Barone, Lee Klinger, Pam, Devin Morris

21. Identify all individuals with knowledge or information concerning Plaintiff's allegation that Defendants did not report or transmit withholdings to taxing authorities.

Lee Klinger, Devin Morris, Laura Walker, Beatrice Caraballo, Nicole Stabile, Laura Huddleston, Lyat Mizrahi, Rayan Persaud, Stacey Hochstin, Nataly Goldstein, Robin Mizrahi

22. Identify each person who manually wrote checks for payment of wages to employees, including Plaintiff, for the period 2011-2016.

Laurie Barone, Diane Civitano, Pam Hochstin, Robin Mizrahi

23. Identify each person who called in hours of work to the accountant or the payroll company for employees, including Plaintiff, for the period 2011-2016.

Robin Mizrahi, Laurie Barone, Pam Hochstin, Diane Civitano, Anita Vargas

24. Identify each person with knowledge or information as to Plaintiffs alleged damages.

Clif Bennette

25. To the extent not already identified, identify all individuals with knowledge or information relevant to the subject matter of the action and the allegations in the Complaint.

Barbara (of the Scarsdale Inquirer) and the mandatory names already supplied.